

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PATTIVA McKEAN,)
)
Plaintiff,)
)
v.) C. A. No. 06-526-***
)
NORFOLK SOUTHERN RAILWAY)
COMPANY, a Virginia corporation,)
)
Defendant.)

NOTICE OF RECORDS DEPOSITION

TO: Nicholas H. Rodriguez
Schmittinger and Rodriguez, P.A.
414 South State Street
P.O. Box 497
Dover, DE 19903-0497
nrodriguez@schmittrod.com

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of the following entity at the time and date listed opposite its name, at the offices of Potter Anderson & Corroon LLP, Hercules Plaza, 6th Floor, 1313 North Market Street, Wilmington, Delaware 19801:

Blue Cross Blue Shield of Delaware c/o Insurance Commissioner State of Delaware 841 Silver Lake Boulevard Dover, DE 19901	July 2, 2007 9:00 a.m.
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DUCES TECUM: Copies of any and all records relating to ID No. SOD258772, Account No. 107363, Insured: Pattiva McKean (DOB: 11/8/72; SSN: 527-41-2050), including, but not limited to, medical records, claim forms, payment logs, correspondence, letters of denial, or any other related documents in your custody or control relating to this individual.

* Personal appearance is waived if the requested records are received on or before the date listed above.

You are invited to attend and cross-examine.

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore
Daniel F. Wolcott, Jr. (#284)
David E. Moore (#3983)
Hercules Plaza, 6th Floor
1313 N. Market Street,
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Dated: May 31, 2007
797923 / 30577

Counsel for Defendant
Norfolk Southern Railway Company

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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on May 31, 2007, the attached document was sent by U.S. Mail and Electronic Mail to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading:

Nicholas H. Rodriguez
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/s/ David E. Moore

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